

# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Paradigm Midstream Services - ST, LLC

AUTHORIZING THE OPERATION OF  
Traylor North 1 Central Facility  
Oil and Gas Pipeline and Related Structures Construction

LOCATED AT  
Zavala County, Texas  
Latitude 28° 50' 31" Longitude 99° 30' 42"  
Regulated Entity Number: RN108304643

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No:     O4065     Issuance Date: \_\_\_\_\_

\_\_\_\_\_  
For the Commission

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## **General Terms and Conditions**

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

## **Special Terms and Conditions:**

### **Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting**

1. Permit holder shall comply with the following requirements:
  - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
  - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
  - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
  - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):

- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
  - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
  - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as

required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
  - B. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- 4. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

#### **Additional Monitoring Requirements**

- 5. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached "CAM Summary" upon issuance of the permit. In addition, the permit holder shall comply with the following:
  - A. For units (insert unit ID numbers for CAM proposals submitted in this application and which are submitting/requesting a CAM implementation plan and schedule), the permit holder shall comply with the compliance assurance monitoring requirements, as specified in the attached "CAM Summary," within 180 days from (for revisions projects choose the effective permit revision date for the revision incorporating CAM requirements for these units OR for initial issuance or renewal projects choose issuance of the permit). This "CAM Schedule" requires the permit holder to install, test, or perform final verification of the operational status of the monitoring, contained in the attached "CAM Summary," within 180 days.
  - B. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
  - C. The permit holder shall report, consistent with the averaging time identified in the "CAM Summary," deviations as defined by the deviation limit in the "CAM Summary." Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
  - D. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "CAM Summary," for purposes of determining whether a deviation has occurred.

However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).

- E. The permit holder shall operate the monitoring, identified in the attached “CAM Summary,” in accordance with the provisions of 40 CFR § 64.7.
  - F. The permit holder shall comply with either of the following requirements for any capture system associated with the VOC control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions:
    - (i) Once a year the permit holder shall inspect the capture system in compliance of CAM for leaks in accordance with 40 CFR Part 60, Appendix A, Test Method 21. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppm above background or as defined by the underlying applicable requirement; or
    - (ii) Once a month, the permit holder shall conduct a visual, audible, and/or olfactory inspection of the capture system in compliance of CAM to detect leaking components.
  - G. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.
  - H. Start of operation of the monitoring specified in the “CAM Summary” after the 180 day “CAM Schedule” shall be reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).
6. The permit holder shall comply with the periodic monitoring requirements as specified in the attached “Periodic Monitoring Summary” upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the “Periodic Monitoring Summary,” for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

#### **New Source Review Authorization Requirements**

- 7. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit

- C. Are not eligible for a permit shield
- 8. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 9. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).
- 10. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
  - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
  - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
  - C. Requirements of the Air Quality Standard Permit for Oil and Gas Handling and Production Facilities

### **Compliance Requirements**

- 11. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
- 12. Use of Discrete Emission Credits to comply with the applicable requirements:
  - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) If applicable, offsets for Title 30 TAC Chapter 116
    - (iv) Temporarily exceed state NSR permit allowables
  - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)



- (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
- (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
- (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
- (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

#### **Permit Location**

- 13. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit off site at the offices of Paradigm Energy Partners, LLC, 545 East John Carpenter Freeway, Suite 800, Irving, Texas, 75062-3931.

#### **Permit Shield (30 TAC § 122.148)**

- 14. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

## **Attachments**

**Applicable Requirements Summary**

**Additional Monitoring Requirements**

**Permit Shield**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

**Unit Summary ..... 10**

**Applicable Requirements Summary ..... 11**

Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
FL-1	Flares	N/A	R1111-FL-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FL-2	Flares	N/A	R1111-FL-2	30 TAC Chapter 111, Visible Emissions	No changing attributes.
GRP-HTR	Emission Points/Stationary Vents/Process Vents	HT-1A, HT-1B, HT-2	R1111-HTR	30 TAC Chapter 111, Visible Emissions	No changing attributes.
GRP-OTK	Miscellaneous Units	OTK-1, OTK-2, OTK-3, OTK-4, OTK-5, OTK-6, OTK-7, OTK-8	NSR 132116	30 TAC Chapter 116, Standard Permits	No changing attributes.
LOAD	Miscellaneous Units	N/A	NSR 132116	30 TAC Chapter 116, Standard Permits	No changing attributes.

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
FL-1	CD	R1111-FL-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period, except for upset emissions as provided in §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FL-2	CD	R1111-FL-2	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period, except for upset emissions as provided in §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
GRP-HTR	EP	R1111-HTR	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(B) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 20% averaged over a six minute period for any source on which construction was begun after January 31, 1972.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
GRP-OTK	EU	NSR 132116	VOC	30 TAC Chapter 116, Standard Permits	NSR 132116	The emission unit uses a control device to achieve compliance with the emission limitation or standard and has a pre-control device potential to emit greater than or equal to the amount in tons per year required for a site to be classified as a major source.	NSR 132116 ** See CAM Summary	None	None
LOAD	EU	NSR 132116	VOC	30 TAC Chapter 116, Standard Permits	NSR 132116	The emission unit uses a control device to achieve compliance with the emission limitation or standard and has a pre-control device potential to emit greater than or equal to the amount in tons per year required for a site to be classified as a major source.	NSR 132116 ** See CAM Summary	None	None

**Additional Monitoring Requirements**

<b>Compliance Assurance Monitoring Summary .....</b>	<b>13</b>
<b>Periodic Monitoring Summary .....</b>	<b>15</b>

### CAM Summary

Unit/Group/Process Information	
ID No.: GRP-OTK	
Control Device ID No.: FL-1, FL-2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: NSR 132116
Pollutant: VOC	Main Standard: NSR 132116
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: No pilot flame.	
<p>CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.</p>	

### CAM Summary

Unit/Group/Process Information	
ID No.: LOAD	
Control Device ID No.: FL-1, FL-2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: NSR 132116
Pollutant: VOC	Main Standard: NSR 132116
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: No pilot flame.	
<p>CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.</p>	



## Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-HTR	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-HTR
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(B)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually or at any time an alternate fuel is used	
Averaging Period: n/a	
Deviation Limit: An alternate fuel, not field gas, is used.	
<p>Periodic Monitoring Text: Record the type of fuel used by the unit. If an alternate fuel is fired, either alone or in combination with the specified gas, for a period greater than or equal to 24 consecutive hours it shall be considered and reported as a deviation or the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are observed. Any time an alternate fuel is fired for a period of greater than 7 consecutive days then visible emissions observations will be conducted no less than once per week. Documentation of all observations shall be maintained. If visible emissions are present during the firing of an alternate fuel, the permit holder shall either list this occurrence as a deviation or the permit holder may determine the opacity consistent with Test Method 9. Any opacity readings that are above the opacity limit from the underlying applicable requirement shall be reported as a deviation.</p>	

**Permit Shield**

**Permit Shield ..... 17**

### Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
FUG-1	N/A	40 CFR Part 60, Subpart OOOO	Facility is not an onshore natural gas processing plant.
FUG-1	N/A	40 CFR Part 60, Subpart OOOOa	Construction commenced prior to September 18, 2015.
GB-TK	N/A	40 CFR Part 60, Subpart Kb	The gunbarrel tank is a process tank which is not considered a storage vessel according to the definitions in the regulation.
GRP-BOTK	BOTK-1, BOTK-2	40 CFR Part 60, Subpart Kb	These tanks have a capacity of less than 75 cubic meters (19,900 gallons).
GRP-OTK	OTK-1, OTK-2, OTK-3, OTK-4, OTK-5, OTK-6, OTK-7, OTK-8	40 CFR Part 60, Subpart Kb	These tanks have a capacity of less than 75 cubic meters (19,900 gallons).
GRP-PTK	PTK-1, PTK-2, PTK-3, PTK-4, PTK-5, PTK-6	40 CFR Part 60, Subpart Kb	These tanks have a capacity of less than 75 cubic meters (19,900 gallons).
GRP-WTK	WTK-1, WTK-2, WTK-3, WTK-4, WTK-5, WTK-6, WTK-7, WTK-8	40 CFR Part 60, Subpart Kb	These tanks have a capacity of less than 75 cubic meters (19,900 gallons).
LOAD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	This facility is not located in a covered attainment county or in a non-attainment county.

**New Source Review Authorization References**

<b>New Source Review Authorization References .....</b>	<b>19</b>
<b>New Source Review Authorization References by Emission Unit .....</b>	<b>20</b>

### **New Source Review Authorization References**

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 132116	Issuance Date: 07/03/2018

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
BOTK-1	BAD OIL TANK 1	132116
BOTK-2	BAD OIL TANK 2	132116
FL-1	LOW PRESSURE FLARE	132116
FL-2	HIGH PRESSURE FLARE	132116
FUG-1	FUGITIVE EMISSIONS	132116
GB-TK	GUNBARREL TANK	132116
HT-1A	HEATER TREATER 1A	132116
HT-1B	HEATER TREATER 1B	132116
HT-2	HEATER TREATER 2	132116
LOAD	TRUCK LOADING	132116
OTK-1	OIL/CONDENSATE TANK 1	132116
OTK-2	OIL/CONDENSATE TANK 2	132116
OTK-3	OIL/CONDENSATE TANK 3	132116
OTK-4	OIL/CONDENSATE TANK 4	132116
OTK-5	OIL/CONDENSATE TANK 5	132116
OTK-6	OIL/CONDENSATE TANK 6	132116
OTK-7	OIL/CONDENSATE TANK 7	132116
OTK-8	OIL/CONDENSATE TANK 8	132116
PTK-1	PIGGING TANK 1	132116
PTK-2	PIGGING TANK 2	132116
PTK-3	PIGGING TANK 3	132116

### **New Source Review Authorization References by Emissions Unit**

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

<b>Unit/Group/Process ID No.</b>	<b>Emission Unit Name/Description</b>	<b>New Source Review Authorization</b>
PTK-4	PIGGING TANK 4	132116
PTK-5	PIGGING TANK 5	132116
PTK-6	PIGGING TANK 6	132116
WTK-1	PRODUCED WATER TANK 1	132116
WTK-2	PRODUCED WATER TANK 2	132116
WTK-3	PRODUCED WATER TANK 3	132116
WTK-4	PRODUCED WATER TANK 4	132116
WTK-5	PRODUCED WATER TANK 5	132116
WTK-6	PRODUCED WATER TANK 6	132116
WTK-7	PRODUCED WATER TANK 7	132116
WTK-8	PRODUCED WATER TANK 8	132116

**Appendix A**

**Acronym List ..... 23**



## Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H <sub>2</sub> S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
SIP	state implementation plan
SO <sub>2</sub>	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound